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Via ECF and Email

January 10, 2019

The Hon. Robert W. Lehrburger
 U.S. Magistrate Judge, Southern District of New York
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl Street, Room 1960
 New York, NY 10007
 (Lehrburger_NYSDChambers@nysd.uscourts.gov)

RE: Joint Request to Extend Discovery Deadlines
Essar Steel Algoma Inc. v. Nevada Holdings, Inc. f/k/a Southern Coal Sales Corporation, Case No. 1:17-mc-00360-AT-RWL

Dear Judge Lehrburger:

On December 3, 2018, Your Honor entered an Order (Dkt. 97) setting the following schedule.

Event	Deadline
Defendant's production of documents and interrogatory responses pursuant to dkt. 87	December 11, 2018
Conclude Rule 30(b)(6) deposition of Defendant	January 11, 2019
Plaintiff expert report(s)	January 22, 2019
Deposition of Plaintiff's expert witness(es)	February 1, 2019
Defendant's expert report(s)	February 12, 2019
Deposition of Defendant's expert witness(es)	February 22, 2019

Plaintiff Essar Steel Algoma Inc. ("Algoma") and Defendant Nevada Holdings, Inc. f/k/a Southern Coal Sales Corporation ("SCSC") respectfully submit this joint request for an extension of that schedule.

Algoma submits that an extension is necessary so that it may review SCSC-produced documents (received December 11, December 21, January 4, and a substantial production on January 8) prior to reconvening the deposition. Algoma seeks adequate time to review the documents and prepare for and complete the deposition.

SCSC's agrees to the extension primarily because it has retained new lead counsel last week, and counsel has scheduling conflicts in late January and early February.

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Accordingly, the parties jointly request an extension of the discovery schedule as follows.

Event	Deadline
Conclude Rule 30(b)(6) deposition of Defendant	February 13, 2019
Plaintiff expert report(s)	February 27, 2019
Deposition of Plaintiff's expert witness(es)	March 8, 2019
Defendant's expert report(s) ¹	March 19, 2019
Deposition of Defendant's expert witness(es)	March 29, 2019

Thank you for your consideration.

Respectfully yours,

s/ Kip T. Bollin

Kip T. Bollin
Counsel for Plaintiff Essar Steel Algoma Inc.

s/ Richard A. Getty

Richard A. Getty
Counsel for Defendant Nevada Holdings, Inc.
f/k/a Southern Coal Sales Corporation

Enclosure

cc: All counsel of record via ECF notice

¹ As before, should SCSC submit an expert report on that concerns a new topic (as opposed to a responsive or rebuttal report), Algoma will then "raise the issue" regarding the opportunity to provide a rebuttal report. (Dkt. 97.)